Message

kareen.toussagnon@daimler.com [kareen.toussagnon@daimler.com] From:

Sent: 6/13/2016 9:02:33 AM

To: Cullen, Daniel [/o=ExchangeLabs/ou=Exchange Administrative Group

(FYDIBOHF23SPDLT)/cn=Recipients/cn=0feb8e3bbb3943a9afc1cbe32e40e3bc-Cullen, Dan]

CC: felix.wellmann@daimler.com

Subject: RE: AAF updates to TG: GMBXT03.0U2A

Attachments: Urgent Topics -> your feedback is highly appreciated

Hello Dan,

Thank you for the information. I will proceed as instructed. I have a follow-up question regarding this issue.

We have discussed the CSI update with CARB since it will affect MY16 EO (emissions data is displayed on EOs unlike COCs)

Paul Depinder from CARB has mentioned sending an email to EPA regarding this topic but per my understanding he has yet not received any feedback.

Would it be acceptable to you if I share our email correspondences (below)I with CARB and cc you? This will ensure that we all have the same understanding regarding,

- Carry over MY15 AAF values to MY16 (ref. attached email)
- Update to MY16 CSI to reflect correct AAF values form MY15

Please let me know your input.

Thank you and have a nice day.

Mit freundlichen Grüssen / With best regards/ Salutations cordiales

E. Kareen Toussagnon

Emission and Fuel Economy Certification USA/Canada Mercedes-Benz Cars Development

059/H105-RD/FZE

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Vorstand/Board of Management: Dieter Zetsche (Vorsitzender/Chairman), Wolfgang Bernhard, Christine Hohmann-

Dennhardt, Wilfried Porth, Ola Källenius, Hubertus Troska, Bodo Uebber, Thomas Weber

From: Cullen, Daniel [mailto:Cullen.Daniel@epa.gov]

Sent: Mittwoch, 8. Juni 2016 19:48 **To:** Toussagnon, Kareen (059)

Subject: RE: AAF updates to TG: GMBXT03.0U2A

Kareen,

Hello. Yes, please do follow up with a "Request for CSI Update." That will package all of the information in the system so that the correct information can be accessed in the future.

Thank you,

Dan

From: kareen.toussagnon@daimler.com [mailto:kareen.toussagnon@daimler.com]

Sent: Wednesday, June 08, 2016 9:07 AM **To:** Cullen, Daniel < <u>Cullen.Daniel@epa.gov</u>> **Subject:** AAF updates to TG: GMBXT03.0U2A

Hi Dan,

Regarding TG: GMBXT03.0U2A, the following was performed,

- CSI corrected to reflect use of carry-over AAF values from MY15
- CBI/FOI applications updated to reflect use of carry-over AAF values from MY15

I will upload these "new" versions to Verify shortly. Since there no change in COC, should I follow-up with a "Request for CSI Update"?

Thank you

Mit freundlichen Grüssen / With best regards/ Salutations cordiales

E. Kareen Toussagnon

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From: Wellmann, Felix (059)

Sent: Mittwoch, 27. April 2016 15:03

To: Lipa, John (624)

Cc: Manchanda, Ashim (624); Toussagnon, Kareen (059)

Subject: AW: Urgent Topics -> your feedback is highly appreciated

Hi John,

this is a good news. Kareen will follow up with Dan to get this fixed.

@Kareen: please keep us in the loop (CC)

Regards,

Felix

Von: Lipa, John (624)

Gesendet: Mittwoch, 27. April 2016 14:00

An: Wellmann, Felix (059)

Betreff: FW: Urgent Topics -> your feedback is highly appreciated

Felix – Sorry forgot to copy you on this e-mail. Looks like we got the approval from Dan to use the AAF.

With best regards

John Lipa Senior Manager, Emissions Testing & EPA Liaison RD NA/T

Ann Arbor TechCenter Mercedes-Benz Research & Development, North America, Inc. 3953 Research Park Drive Ann Arbor, MI 48108

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mailto: John.Lipa@Daimler.com

www.mbrdna.com

From: Cullen, Daniel [mailto:Cullen.Daniel@epa.gov]

Sent: Wednesday, April 27, 2016 7:58 AM

To: Lipa, John (624)

Cc: Ball, Joel

Subject: RE: Urgent Topics -> your feedback is highly appreciated

John,

Thank you for the update. I checked your 2015 application and you did in fact use the 0.003 AAF. It appears you are using the same data for the 2016 family. Please update your 2016 application.

Sincerely,

Dan

From: john.lipa@daimler.com [mailto:john.lipa@daimler.com]

Sent: Wednesday, April 27, 2016 6:26 AM **To:** Cullen, Daniel < Cullen. Daniel@epa.gov>

Cc: Ball, Joel < ball.joel@epa.gov>

Subject: RE: Urgent Topics -> your feedback is highly appreciated

Dan.

Thanks for getting back to us so quickly on this issue. Please see the attached information regarding the AAF as I think it will provide you with the answers to your questions.

With best regards

John Lipa Senior Manager, Emissions Testing & EPA Liaison RD NA/T

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mailto: John.Lipa@Daimler.com

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From: Cullen, Daniel [mailto:Cullen.Daniel@epa.gov]

Sent: Tuesday, April 26, 2016 4:03 PM

To: Lipa, John (624)

Cc: Wellmann, Felix (059); Ball, Joel

Subject: RE: Urgent Topics -> your feedback is highly appreciated

John,

Hello. I talked briefly with Joel about this, and we still have some questions relating to item #3? Can you explain what happened? Was the AAF (IRAF) entered mistakenly (like a typo)? What AAF was numerically used, and what should have been put in? What was this AAF based on? (the letter to Mr. Nevers doesn't seem to have any AAF's on it, just a description of what vehicles are grouped together) How do we know that the AAF you are proposing is the correct one? Has it been vetted by the EPA as detailed in §86.1840-01(c)?

If you can provide more detail, I am sure we can come to a path forward on this issue.

Thanks,

Dan

From: john.lipa@daimler.com [mailto:john.lipa@daimler.com]

Sent: Tuesday, April 26, 2016 12:56 PM **To:** Cullen, Daniel < <u>Cullen.Daniel@epa.gov</u>>

Cc: felix.wellmann@daimler.com

Subject: FW: Urgent Topics -> your feedback is highly appreciated

Dan,

I hope everything is going well and the transition into your new role is going smoothly. Please see Felix's e-mail to Joel from a couple of weeks. The first two points have been addressed but we need some direction/resolution on the third point(highlighted in yellow below). Please let Felix or myself know if you have any questions or need any additional information. Thanks

With best regards

John Lipa Senior Manager, Emissions Testing & EPA Liaison RD NA/T

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mailto: John.Lipa@Daimler.com

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From: Wellmann, Felix (059)

Sent: Wednesday, April 13, 2016 12:50 PM

To: Ball, Joel (ball.joel@epa.gov)

Cc: Lipa, John (624); Baeuchle, Dirk D. (059)

Subject: Urgent Topics -> your feedback is highly appreciated

Urgent Topics -> your feedback is highly appreciated

Hello Joel.

I have 3 issues I would like to talk to you.

- 1. Kareen did all the corrections on the Testgroup HMBXJ02.0U2C and did a new CoC request. I would kindly ask you to review this as soon as possible due to the fact that we would like to release the car.
- 2. Ole Loaded up an FOI for the Testgroup HMBJ06.0U2A. In the first version of this FOI he by accident integrated the AECD for this Testgroup. Of course those are CBI. Ole loaded a second version up which do not have the AECD included anymore. I just want to make sure that this first Version with AECD in it doesn't get published.
- 3. Wrong AAF for MY2016 GL350BT Testgroup: As you can see with the approval above normally we should have used the same AAF for this Testgroup like in MY2015. Due to CARB pointing out the question why we do use AFF and DF from two different vehicles and us not being aware of this Approval Letter we changed the AAF to the one of the Sprinter (AAF: 0.0195g/mi) which is not the right (correct AAF would be 0.003g/mi) one for this vehicle. We kindly ask you to give us the possibility to correct this in Verifiy. In perspective of In-Use testing of MY2016 GL350 this is important to us to apply the correct AAF.

Please let me know when it is a good time to have a quick call about this points.

Thank you & Regards,

Felix

Mit freundlichen Grüßen/Kind regards

Felix Wellmann

Manager RD/FZE
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Porth, Ola Källenius, Hubertus Troska, Bodo Uebber, Thomas Weber

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